

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

CALEB MICHAEL DUDLEY,

Plaintiff,

Civil Action No. 3:25-cv-13

v.

STEPHANIE MORTON, *et al.*

Defendants.

**AGREED MOTION FOR AN EXTENSION OF TIME  
TO RESPOND TO THE COMPLAINT**

COMES NOW, Defendant, Stephanie Morton (“Morton”), and for her second motion for an extension of time to respond to the Complaint provides as follows:

1. On January 10, 2025, Plaintiff, Caleb Dudley filed his Complaint. ECF No. 1.
2. Defendant Morton was served on January 24, 2025, making her responsive pleading due by February 14, 2025. *See* ECF No. 5. The Office of the Attorney General noted its appearance for Defendant Morton only on March 4, 2025. *See* ECF No. 8.
3. Due to the cyberattack suffered by the Office of the Attorney General of Virginia, the parties agreed to grant Morton an extension to March 11, 2025, to respond to the Complaint and requested the same of the Court. ECF No. 7.
4. The Court granted ECF No. 7 on March 6, 2025, and allowed Defendant Morton until March 11, 2025, to file any responsive pleading(s). ECF No. 9.
5. The Office of the Attorney General is awaiting some information to assist undersigned counsel in responding to the Complaint. Accordingly, undersigned attorney asked counsel for the Plaintiff if he would be willing to extend the responsive deadline to Friday, March 14, 2025. Plaintiff’s attorney had no objection to such extension.

Therefore, Defendant STEPHANIE MORTON respectfully requests this Court extend her deadline for responding to Plaintiff's Complaint to Friday, March 14, 2025, and to grant the parties any other relief this Court finds just and necessary.

Respectfully submitted,

STEPHANIE MORTON  
*Defendant*

By: /s/ Cassandra E. Sheehan  
Cassandra E. Sheehan, AAG, VSB No. 87990  
Office of the Attorney General  
Criminal Justice & Public Safety Division  
202 North 9<sup>th</sup> Street, Sixth Floor  
Richmond, Virginia 23219  
Telephone: (703) 359-1117  
Facsimile: (804) 786-4239  
Email: csheehan@oag.state.va.us  
*Counsel for K. Daugherty*

**CERTIFICATE OF SERVICE**

I hereby certify that on the March 13, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following individual:

Danny Zemel  
The Krudys Law Firm, PLC  
919 East Main Street, Suite 2020  
Richmond, VA 23219  
Email: dzemel@krudys.com

By: s/ Cassandra E. Sheehan  
Cassandra E. Sheehan, AAG, VSB No. 87990